

AR201-11724

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November 30, 1999

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Ms. Carol Browner, Administrator
United States Environmental Protection Agency
PO Box 1473
Merrifield, VA 22116

Attn: EPA HPVC Challenge Program
Reference: HPV registration number

Dear Ms. Browner:

This letter signifies CONDEA Vista Company (CVC) commitment to sponsor an additional sixty-three chemicals in the HPV Challenge program. This number is in addition to the chemicals CVC has previously committed to sponsor in the program. These additional sixty-three chemicals will be sponsored through CVC's participation in the following consortia: Seventeen in the Soap and Detergent Association (SDA) Aliphatic alcohols Consortium; one in the American Petroleum Institute's Petroleum HPV Testing Group (PHTG), one will be sponsored in both the American Petroleum Institute's HPV program and the Chemical Manufacturers Association Olefins Panel; fourteen in the Aluminum Alkyls Consortium, twelve in the Chemical Manufacturers Association Hydrocarbon Solvents Panel; four in the Chemical Manufacturers Association Higher Olefins Panel; seven in the Chemical Manufacturers Association Olefins Panel; and seven by the Council for LAB/LAS Environmental Research (CLER). These sixty-three additional chemicals are indicated in bold on the attached list which shows, including the materials that CVC has already committed to sponsoring, a total of seventy-four chemicals that CVC is committing to sponsor in the HPV Challenge.

CVC recognizes that sponsorship entails: assembling and reviewing available public and private toxicological data, developing and providing assessment plans for each of the sponsored chemicals and conducting additional research, including testing when necessary, in the time frame established under the HPVC Challenge Program.

There are also a number of substances that CVC has previously reported in its IUR reports that we do not intend to sponsor in the HPV Challenge program. The various reasons why CVC has chosen to not sponsor these materials in the program are discussed in the following paragraphs.



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Impurities

CVC previously reported a number of materials that were actually impurities in other reported substances and are therefore not subject to the IUR reporting requirement. The specific chemicals that fall into this category are discussed below. CVC has modified its IUR reporting procedures and will not report these materials in future IUR reports.

- 1- tetracosanol (506-51-4)**
- 1- hexacosanol (506-52-5)**
- 1- octacosanol (557-61-9)**
- 1- triacontanol (593-50-0)**

Except for a small amount of 1-tetracosanol (506-51-4), which CVC has imported, each of the above materials are impurities and are not manufactured intentionally or isolated individually by CVC. These substances occur at very low concentrations in a single material produced in our alcohol manufacturing unit. Their concentrations in this material are consistent with their designation as impurities. CVC has already committed to the sponsorship of the material that these substances occur in through its participation in the SDA aliphatic alcohols consortium.

CVC is unaware of any companies that are currently reporting these CAS numbers or are planning to use them in the future. No other manufacturers besides CVC were found on EPA's webpage that lists the companies that reported HPV chemicals in either or both of the 1990 and 1994 reporting cycles, as recorded in the non-confidential portion of the IUR database (<http://www.epa.gov/opptintr/chemrtk/hpvcollst.htm>). Consequently, we request that these CAS numbers be removed from the HPV Challenge List.

Ethane (74-84-0)

The above material has been reported in previous IUR reports filed by CVC, however, it is not manufactured intentionally or isolated individually by CVC. This material occurs in other substances at concentrations that are consistent with its designation as an impurity in other substances that are produced in our unit. CVC is committed to the sponsorship of the other substances the chemical occurs in through the CMA Olefins Panel consortium.

- Propyne (74-99-7)**
- Propane, 2-methyl (75-28-5)**
- 1- butyne (107-00-6)**
- 1- buten-3-yne (689-97-4)**
- 1- pentene (109-67-1)**
- 1,2- butadiene (590-19-2)**

Each of the above materials are more properly considered as individual components that are typically present in a single substance that is manufactured in our ethylene unit. None of these materials are manufactured intentionally or isolated individually by CVC. Their concentrations in this material are consistent with their designation as impurities. CVC is committing to the sponsorship of the substance that these materials occur in through the CMA Olefins panel.

No longer manufactured by CVC

ar- toluenesulfonic acid, sodium salt (12068-03-0)

Xylenesulfonic acid, sodium salt (1300-72-7)

Methane, Chloro (74-87-3)

Ethane, 1,2 dichloro, Manuf. of byproduct from distn. Lights (68608-59-3)

CVC has ceased manufacture of the above materials and has no plans of manufacturing them in the future, consequently we do not wish to sponsor them in the HPV Challenge program.

1,2 - benzenedicarboxylic acid, dioctyl ester (117-84-0)

1,2 - benzenedicarboxylic acid, didecyl ester (84-77-5)

Ethene, chloro (75-01-4)

Ethane, 1,2 dichloro (107-06-2)

The above materials represent a special case because CVC has already volunteered to sponsor these materials in the program. However, CVC has since sold the business unit associated with these materials and has ceased their manufacture and has no plans of manufacturing them in the future, consequently we no longer wish to sponsor them in the HPV Challenge program.

Changes in CAS designations

Residues (petroleum), steam-cracked (64742-90-1)

Naphtha (Petroleum), light steam-cracked (64742-83-2)

In the 1998 IUR reporting period, CVC chose to report these two above materials under different CAS designations that more accurately described them. Specifically, Residues (petroleum), steam-cracked (64742-90-1) was reported as Fuel Oil, pyrolysis (69013-21-4) and Naphtha (Petroleum) light steam-cracked (64742-83-2) was reported as Gasoline, pyrolysis, debutanizer bottoms (68606-10-0). CVC is committing to the sponsorship of Fuel Oil, pyrolysis (69013-21-4) and Gasoline, pyrolysis, debutanizer bottoms (68606-10-0) through its participation in the CMA Olefins panel.

CVC looks forward to working with EPA and all other interested stakeholders in the development of this important initiative. Dr. Dave Penney, Ph.D. is our technical contact; he can be reached at 281-588-3059 (phone), 281-588-3478, and dpenney@cvcnet.com. Please feel free to contact Dr. Penney if you have any questions.

Mr. Thomas Grumbles
Manager, Product Safety and Occupational Health
CONDEA Vista Company

Chemicals being sponsored by CONDEA Vista Company in the HPV Challenge Program
 (Additional materials being sponsored as of this letter are indicated in bold)

| Chemical | CAS No. | Consortia | Start Year |
|--|-------------------|--|-------------------|
| 1-Hexanol | 111-27-3 | SDA Aliphatic alcohols consortium | 2001 |
| 1-Octanol | 111-87-5 | SDA Aliphatic alcohols consortium | 2001 |
| 1-Decanol (decyl alcohol) | 112-30-1 | SDA Aliphatic alcohols consortium | 2001 |
| 1-Tetradecanol | 112-72-1 | SDA Aliphatic alcohols consortium | 2001 |
| 1-Hexadecanol | 36653-82-4 | SDA Aliphatic alcohols consortium | 2001 |
| Eicosanol (C20) | 629-96-9 | SDA Aliphatic alcohols consortium | 2001 |
| 1-Docosanol (C22, Behenyl) | 661-19-8 | SDA Aliphatic alcohols consortium | 2001 |
| Alcohols, C16-18 | 67762-27-0 | SDA Aliphatic alcohols consortium | 2001 |
| Alcohols, C18-32 | 68911-61-5 | SDA Aliphatic alcohols consortium | 2001 |
| Alcohols, C16-18, distn. residues | 68603-17-8 | SDA Aliphatic alcohols consortium | 2001 |
| Ethanol, aluminum salt | 555-75-9 | SDA Aliphatic alcohols consortium | 2001 |
| 1-Butanol, aluminum salt | 3085-30-1 | SDA Aliphatic alcohols consortium | 2001 |
| Aluminum hexyloxide, 1-hexanol, aluminum salts | 23275-26-5 | SDA Aliphatic alcohols consortium | 2001 |
| Aluminum octyloxide, (Al(C ₈ H ₁₇ O) ₃); 1-Octanol, aluminum salts | 14624-13-6 | SDA Aliphatic alcohols consortium | 2001 |
| Aluminum decyloxide, 1-decanol, aluminum salts | 26303-54-8 | SDA Aliphatic alcohols Consortium | 2001 |
| Aluminum dodecyloxide; 1-dodecanol, aluminum salts | 14624-15-8 | SDA Aliphatic alcohols Consortium | 2001 |
| 1-Tetradecanol, aluminum salt | 67905-32-2 | SDA Aliphatic alcohols Consortium | 2001 |
| Aluminum hexadecyloxide; 1-hexadecanol, aluminum salts | 19141-82-3 | SDA Aliphatic alcohols Consortium | 2001 |
| Aluminum octadecyl oxide; 1-Octadecanol, aluminum salts | 3985-81-7 | SDA Aliphatic alcohols consortium | 2001 |
| 1-Eicosanol, aluminum salt | 67905-31-1 | SDA Aliphatic alcohols consortium | 2001 |
| 1-Docosanol, aluminum salt | 67905-30-0 | SDA Aliphatic alcohols consortium | 2001 |
| 1-Tetracosanol, aluminum salt | 67905-29-7 | SDA Aliphatic alcohols Consortium | 2001 |
| 1-hexadecanol, aluminum salts | 67905-28-6 | SDA Aliphatic alcohols Consortium | 2001 |
| 1-Octacosanol, aluminum salt | 67905-27-5 | SDA Aliphatic alcohols Consortium | 2001 |
| 1-triacontanol, aluminum | 67905-26-4 | SDA Aliphatic alcohols Consortium | 2001 |
| Aluminum, triethyl- | 97-93-8 | Aluminum Alkyls Consortium | 2001 |
| Aluminum, tributyl- | 1116-70-7 | Aluminum Alkyls Consortium | 2001 |
| Aluminum, trihexyl- | 1116-73-0 | Aluminum Alkyls Consortium | 2001 |
| Aluminum, trioctyl- | 1070-00-4 | Aluminum Alkyls Consortium | 2001 |
| Aluminum, tris(decyl)- | 1726-66-5 | Aluminum Alkyls Consortium | 2001 |

Chemicals being sponsored by CONDEA Vista Company in the HPV Challenge Program
 (Additional materials being sponsored as of this letter are indicated in bold)

| Chemical | CAS No. | Consortia | Start Year |
|---|----------------|---|-------------------|
| Aluminum, tridodecyl- | 1529-59-5 | Aluminum Alkyls Consortium | 2001 |
| Aluminum, tritetradecyl- | 1529-58-4 | Aluminum Alkyls Consortium | 2001 |
| Aluminum, trihexadecyl- | 1726-65-4 | Aluminum Alkyls Consortium | 2001 |
| Aluminum, trioctadecyl- | 3041-23-4 | Aluminum Alkyls Consortium | 2001 |
| Aluminum, trieicosyl- | 1529-57-3 | Aluminum Alkyls Consortium | 2001 |
| Aluminum, tridocosyl- | 6651-25-8 | Aluminum Alkyls Consortium | 2001 |
| Aluminum, tritetracosyl- | 6651-26-9 | Aluminum Alkyls Consortium | 2001 |
| Aluminum, trihexacosyl- | 10449-71-5 | Aluminum Alkyls Consortium | 2001 |
| Aluminum, trioctacosyl- | 6651-27-0 | Aluminum Alkyls Consortium | 2001 |
| 1-Propene (propylene) | 115-07-1 | CMA Olefins Panel | 2001 |
| Butene | 25167-67-3 | CMA Olefins Panel | 2001 |
| Gasoline, pyrolysis, debutanizer bottoms | 68606-10-0 | CMA Olefins Panel | 2001 |
| Fuel Oil, pyrolysis | 69013-21-4 | CMA Olefins Panel | 2001 |
| Gases, (Petroleum) Light | 68955-28-2 | CMA Olefins Panel | 2000 |
| Steam Cracked, Butadiene Conc. | | | |
| Alkenes, C10-12, C11 rich | 68526-57-8 | CMA Higher Olefins Panel | 2001 |
| 1-Hexadecene | 629-73-2 | CMA Higher Olefins Panel | 2001 |
| 1-Octadecene | 112-88-9 | CMA Higher Olefins Panel | 2001 |
| Hexene | 25264-93-1 | CMA Higher Olefins Panel | 2001 |
| Methane | 74-82-8 | CMA Olefins Panel and API Petroleum HPV Testing Group (PHTG) | 2000* |
| Propane | 74-98-6 | CMA Olefins Panel | 2000* |
| Butane | 106-97-8 | CMA Olefins Panel | 2000* |
| Hexane | 110-54-3 | CMA Hydrocarbon Solvents Panel | 2001 |
| Heptane | 142-82-5 | CMA Hydrocarbon Solvents Panel | 2001 |
| Octane | 111-65-9 | CMA Hydrocarbon Solvents Panel | 2001 |
| Nonane | 111-84-2 | CMA Hydrocarbon Solvents Panel | 2001 |
| Dodecane | 112-40-3 | CMA Hydrocarbon Solvents Panel | 2001 |
| tridecane | 629-50-5 | CMA Hydrocarbon Solvents Panel | 2001 |
| Pentadecane | 629-62-9 | CMA Hydrocarbon Solvents Panel | 2001 |
| Hexadecane | 544-76-3 | CMA Hydrocarbon Solvents Panel | 2001 |
| Alkanes, C10-14 | 93924-07-3 | CMA Hydrocarbon Solvents Panel | 2001 |
| Alkanes, C12-14 | 129813-67-8 | CMA Hydrocarbon Solvents Panel | 2001 |
| Alkanes, C14-16 | 90622-46-1 | CMA Hydrocarbon Solvents Panel | 2001 |
| Distillates, (petroleum), hydrotreated light | 64742-47-8 | CMA Hydrocarbon Solvents Panel | 2001 |
| naptha (petroleum), hydrotreated heavy | 64742-48-9 | CMA Hydrocarbon Solvents Panel | 2001 |
| Raffinates, (petroleum), sorption process | 64741-85-1 | CMA Hydrocarbon Solvents Panel | 2001 |
| Waste, Petroleum | 68477-26-9 | American Petroleum Institute Petroleum HPV Testing Group (PHTG) | 2003 |

Chemicals being sponsored by CONDEA Vista Company in the HPV Challenge Program
(Additional materials being sponsored as of this letter are indicated in bold)

| Chemical | CAS No. | Consortia | Start Year |
|---|----------------|---|-------------------|
| Benzene, mono C12-13-alkyl branched derivs. | 151911-57-8 | CONDEA Vista Company | 2002 |
| Benzene, mono-C10-13-alkyl derivs., fractionation bottoms, light ends | 129813-62-3 | Council for LAB/LAS Environmental Research (CLER) | 2001 |
| Benzene, mono-C10-13-alkyl derivs., distn. residues | 84961-70-6 | Council for LAB/LAS Environmental Research (CLER) | 2001 |
| Benzene, mono-C10-13-alkyl derivs., fractionation bottoms, heavy ends | 94094-93-6 | Council for LAB/LAS Environmental Research (CLER) | 2001 |
| Benzene, mono-C10-14-alkyl derivs., fractionation bottoms | 85117-41-5 | Council for LAB/LAS Environmental Research (CLER) | 2001 |
| Benzene, Mono C12-13 branched alkyl derivs., fractions | 151911-58-9 | Council for LAB/LAS Environmental Research (CLER) | 2001 |
| Benzene, mono-C12-14-alkyl derivs., fractionation bottoms | 68515-32-2 | Council for LAB/LAS Environmental Research (CLER) | 2001 |
| Benzene, mono-C12-14-alkyl derivs., fractionation bottoms, heavy ends | 68515-34-4 | Council for LAB/LAS Environmental Research (CLER) | 2001 |

*This material has already been volunteered by the American Petroleum Institute Petroleum HPV Testing Group (PHTG) and the PHTG and the CMA Olefins Panel have agreed that PHTG will be responsible for the testing and documentation of results for this CAS number.

Chemicals that CONDEA Vista Company requests be removed from the HPV list

| | |
|-----------------|----------|
| 1- tetracosanol | 506-51-4 |
| 1- hexacosanol | 506-52-5 |
| 1- octacosanol | 557-61-9 |
| 1- triacontanol | 593-50-0 |